

REMARKS

Applicant appreciates the consideration shown by the U.S. Patent Office, as evidenced by the May 24th, 2007 Office Action. In that Office Action, out of claims 1-35, claims 1-35, were rejected. New claims 37-37 have been added. As such, 37 claims remain in the application, with amendments to claims 1, 18, 22, 25, and 26.

Applicant respectfully requests reconsideration of the application by the Examiner in light of the above amendments and the following remarks in response to the May 24th, 2007 Office Action.

Applicant has amended claims 1, 18, 22, 25, and 26 to facilitate prosecution of the application; the amendments are supported by the specification as filed do not include new matter.

NOVELTY

The claims are not anticipated because the cited references fail to disclose a catalyst injection system that is mobile, fails to disclose a catalyst injection system configured to be coupled to an FCC unit and fails to disclose a catalyst injection system adapted to control flow of catalyst directly to the FCC unit.

Novelty over Andon

The Office Action rejected claims 1-4, 9, 18 and 22 under 35 U.S.C. 102(b) as allegedly anticipated by Andon (US 4082513).

Regarding independent claim 1, the Office Action erroneously and mistakenly alleges that Andon discloses “a mobile catalyst injection system comprising: a transportable platform (column 2, lines 11-12), a catalyst reservoir coupled to the platform (10) and adapted to be coupled to a fluid catalyst cracking unit (14), and a flow control device coupled to an outlet of the reservoir (15) and adapted to control the flow of catalyst through the outlet port.” (Office Action page 2 paragraph 6) Regarding claim 2, the Office Action alleges Andon discloses wherein the platform is a trailer (column 2, lines 11-12). Regarding claim 4, the Office Action alleges Andon discloses wherein the platform is a railroad car (column 2, lines 1-12). Regarding claim 9, the Office Action alleges Andon discloses a pressure control system (column 2, lines 51-56) coupled to the platform (column 2, lines 11-12) and the catalyst reservoir (10) for controlling pressure within the catalyst reservoir.

To anticipate under §102, a reference must teach *every aspect* of the claimed invention. In this case, Andon only discloses a catalyst storage tank that is just capable of ‘receiving catalyst’ from trucks or cars, the catalyst is then transferred to an addition hopper(16), and then to an FCC unit; Andon fails to disclose a catalyst injection system that itself is mobile and a catalyst injection system configured to be coupled to an FCC unit and adapted to control the flow of catalyst directly to the FCC unit, each undisclosed element of which independently refute that the present claims are anticipated.

By words and drawings, Andon repeatedly only discloses catalyst storage tank that is just capable of ‘receiving catalyst’; the catalyst storage tank then transfers catalyst to an addition hopper(16) and then to FCC, as *correctly* quoted below:

“The catalyst storage tank 10 has a bulk fill line 11 fitted with a valve 28 for receiving catalyst from tank trucks or tank cars, a vent line 2 fitted with an automatic valve 13, and a catalyst discharge line 14 fitted with automatic valve 15. The catalyst addition hopper 16 is located so that its lowest point is about ten feet below the bottom of the catalyst storage tank 10 and is connected near its top to the other ends of vent line 12 and catalyst addition line 14. . . . The bottom of addition hopper 16 is shaped to permit full discharge of its contents through discharge line 19. Line 19 is conveys the catalyst to the regenerator section of the fluid catalytic cracker. Col 2, lines 9-26).

The Office Action seems to misunderstand that Andon’s catalyst storage tank is just capable of ‘receiving catalyst’ and is neither mobile, configured to be coupled to an FCC unit nor adapted to control the flow of catalyst directly to the FCC unit. Furthermore, Andon’s Figure 1 also shows that Andon’s catalyst storage tank (10) receives the catalyst, the catalyst is then transferred to the addition hopper (16), and then from the addition hopper (16) to FCC. Andon discloses sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the addition hopper; and then from addition hopper to FCC unit (i.e. from A to B to C to FCC Unit) as opposed to from a mobile catalyst injection system configured to be coupled to an FCC Unit (i.e. from A to FCC Unit) and adapted to control the flow of catalyst directly to the FCC Unit, wherein the mobile catalyst injection system compromises a transportable platform, catalyst reservoir, and flow control device.

What is mobile or made mobile in Andon is the truck or trailer or catalyst storage tank, not the addition system. Andon does not disclose all the claim limitations because during the

sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the addition hopper; and then from addition hopper to FCC unit (i.e. from A to B to C to FCC Unit), the addition system is not neither mobile, configured to be coupled to an FCC unit nor adapted to control the flow of catalyst directly to the FCC unit. Thus, Andon only discloses a catalyst storage tank capable of ‘receiving catalyst’ from trucks or cars and fails to disclose a catalyst injection system that is mobile and is configured to be coupled to an FCC unit and adapted to control the flow directly to the FCC unit.

It is a fundamental principle in patent law that an inventor may be his own lexicographer (*Autogiro Co. of Am. v. United States*, 384 F.2d 391 at 397 1967). Claims are given ordinary meaning unless the specification provides a specific definition. In this case, the specification unambiguously, clearly and specifically defines an FCC unit in words and drawings, such as but not limited to, paragraph [0002] and [0004] and Fig. 1 and 2. The FCC unit is defined as distinct and separate from a catalyst addition system.

Furthermore, regarding claim 36 (formerly the elements of claim 18 prior to amendments herein), although the Office Action even admits that Andon does not explicitly disclose “a generator coupled to the pressure control system,” the Office Action incorrectly alleges such a limitation is inherently disclosed since the person having ordinary skill in the art would recognize that in order to provide the automatic pressure control for the system there must necessarily be “a generator” or other source of electricity to drive the valves. (Office Action page 3 last paragraph)

Inherency may not be established by probabilities or possibilities. The mere fact that a certain thing *may* result from a given set of circumstances is not sufficient.” *In re Oelrich*, 666 F.2d. 578, 581. The missing element *must* necessary result from the prior art references. In this case, the Office Action has not demonstrated that a generator must be coupled to the pressure control system; a generator does not necessary need to be coupled to the pressure control system because pressure may be from other sources or ways, such as from a facility, etc, while the valves may be controlled by other means, such as pneumatically. The Office action has not provided any reference or basis for the assertion of how there must necessarily be “a generator”.

Consequently, Applicant respectfully submits that independent claims 1, 18, 22, and 26 are not anticipated because the Office Action fails to teach *every aspect* of independent claims.

RESPONSE TO OFFICE ACTION
Serial No. 10/717,249
Page 10 of 19

Applicant respectfully submits that as current independent claims are not anticipated, the claims which depend from the independent claims are also not anticipated.

NONOBVIOUSNESS

The claims are not obvious because the cited references, either individually or in combination, fail to disclose a catalyst injection system that is mobile, fails to disclose a mobile catalyst injection system configured to an FCC unit, and also fails to disclose a mobile catalyst injection system adapted to control the flow of catalyst directly to the FCC unit.

Nonobviousness over Andon

The Office Action rejected dependent claims 5 and 6 under 35 U.S.C. 103 (a) allegedly unpatentable over Andon (U.S. 4,082,513). Regarding claim 5, the Office Action erroneously and mistakenly alleges that Andon discloses a mobile catalyst injection system comprising: a transportable platform (column 2, lines 11-12), a catalyst reservoir coupled to the platform (10) and adapted to be coupled to a fluid catalyst cracking unit (14), and a flow control device coupled to an outlet of the reservoir (15) and adapted to control the flow of catalyst through the outlet port. Although the Office Action even admits that **Andon fails to disclose wherein the platform is a pallet** (Page 5 paragraph 17), the Office Action nonetheless alleges that, a barge is known in the art to be a substitute means for transporting material. Thus, it would have allegedly been obvious to the person having ordinary skill in the art at the time the invention was made to use a pallet or barge as a “transportable platform” in a mobile catalyst injection system.

As discussed above, Andon expressly discloses a catalyst storage tank that is just capable of ‘receiving catalyst’ from trucks or cars and fails to disclose a catalyst injection system that is mobile, is **configured to be coupled to an FCC unit and is adapted to control flow of catalyst directly to the FCC unit**, each undisclosed element of which independently refute that the present claims are obvious.

To establish a *prima facie* case of obviousness, according to MPEP and past and recent case law, it is and still remains *necessary* for the Examiner to demonstrate a motivation to modify, some reason that would lead **one of ordinary skill in the art modify a known prior art. Takeda Chemical Industries, Ltd. v. Alphapharm Pty., Ltd. 06-1329 Fed. Cir. 2007.**

Allegations of ‘obvious to try’ is not sufficient if “the situation presented was not one with “a finite number of *identified, predictable solutions.*” Thus, an Examiner must necessarily identify some reason that would have led one of ordinary skill in the art to make the modification.

In this case, the issue is not whether Andon reference may merely be modified; but whether Andon provides any suggestion or motivation to modify and a reasonable expectation of success in disclosing a catalyst injection system that is mobile, is configured to be coupled to an FCC unit and is adapted to control flow of catalyst directly to the FCC unit.

Independent claim 1 is not obvious because the Office Action fails to demonstrate a catalyst injection system that is mobile and a mobile catalyst injection system configured to be coupled to an FCC unit and adapted to control flow of catalyst directly to the FCC unit. As discussed above, Andon discloses sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the addition hopper; and then from addition hopper to FCC unit (i.e. from A to B to C to FCC Unit) as opposed to from a mobile catalyst injection system configured to be coupled to an FCC Unit and adapted to control flow of catalyst directly to the FCC unit, wherein the catalyst injection system compromises a transportable platform, catalyst reservoir, and flow control device. What is mobile or made mobile in Andon is the truck or trailer, not the addition system. Andon does not disclose all the claim limitations because during the sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the addition hopper; and then from addition hopper to FCC unit (i.e. from A to B to C to FCC Unit), the catalyst injection system is not mobile nor is an catalyst injection system configured to be coupled to an FCC unit nor is an catalyst injection system adapted to control flow of catalyst directly to the FCC unit. Thus, Andon only discloses a catalyst storage tank capable of ‘receiving catalyst’ from trucks or cars and fails to disclose a catalyst injection system that is mobile and is configured to be coupled to an FCC unit and adapted to control flow of catalyst directly to the FCC unit.

Furthermore, the Office Action fails to demonstrate any suggestion or motivation to modify Andon’s catalyst injection system to be mobile and/or to comprise a mobile catalyst injection system configured to be coupled to and adapted to control flow of catalyst to an FCC unit. Nor has the Office Action demonstrated a reasonable expectation of success. The Office

RESPONSE TO OFFICE ACTION
Serial No. 10/717,249
Page 12 of 19

Action merely alleged "it would have been obvious" to *modify* Andon without demonstrating why one of ordinary skill in the art would have allegedly been *motivated to modify* Andon to disclose a catalyst injection system that is mobile and/or *configured to be coupled to and adapted to control flow of catalyst to an FCC unit.*

Thus, Applicant respectfully submits that the rejection is overcome and independent claims are not obvious. Applicant respectfully submits that as the current independent claims are allowable, the claims which depend from the independent claims are also allowable.

Nonobviousness over Erickson

The Office Action rejected claims 7, 8, 10-12, 17, and 26-30 under 35 U.S.C. 103(a) as allegedly unpatentable over Erickson (U.S. 4,769,127). However, the Office Action *incorrectly* cites Erickson as allegedly disclosing "a mobile catalyst injection system comprising: a transportable platform (56), a catalyst reservoir coupled to the platform (400).... and adapted to control the flow of catalyst through the outlet port, and a generator coupled to the platform (column 5, lines 62-68, and column 6, lines 1-2)."

Erickson fails to disclose a catalyst injection system that itself is **mobile**, a catalyst injection system configured to be coupled to an FCC unit and a catalyst injection system adapted to control the flow of catalyst **directly** to the **FCC unit**, each undisclosed element of which independently refute that the present claims are obvious. By words and drawings, Erickson repeatedly only disclose a catalyst storage container that is **carried and transported by a trolley/monorail to a fresh catalyst silos 68 or 70** and the catalyst is then transferred to the addition hopper (86 or 88); and then from the addition hopper (86 or 88) to reactor as *correctly* quoted below:

"Desirably, an overhead monorail is provided to transport the fresh catalyst bins from the staging area to a discharge area above the silos, as well as to transport the spent catalyst bins from the spent catalyst filling zone to the staging area. In the preferred form, the monorail equipment includes a single overhead rail or track and a trolley which rides upon the rail. A transport carrier is operatively connected to the trolley and is raised and lowered from the trolley by cables. The transport carrier has grab hooks for grasping the fresh and spent catalyst bins." (column 4, lines 20-22)

"The fresh catalyst bin is then lifted off the intelligence pad and raised to the underside of an overhead monorail 52 (FIG. 3) by the grab hooks 54 of a monorail

transport carrier 56. The monorail transport carrier is operatively connected to the monorail trolley 58 by cables 60. The trolley and the grab hooks are operatively connected to the central processing unit and are remotely and automatically controlled. The trolley and grab hooks also have manual override safety controls.” (column 6, lines 62-68)

“Each fresh catalyst container is **carried by the overhead monorail** from the staging area facility to a remote control, computerized lift elevator 62 (FIG. 3). The lift elevator raises the fresh catalyst container to a monorail spur 52' or 52”. The fresh catalyst container is **carried and transported by the trolley** on the monorail spur to a tilting mechanism and discharge assembly 64 or 66 (FIGS. 3 and 4) where the **fresh catalyst contents of the bin are dumped into one of two fresh catalyst silos 68 or 70** depending on the type (composition) of the catalyst. The empty fresh catalyst containers are returned to the staging area, catalyst vendors and suppliers by reversing the above procedure.” (column 6, lines 3-15)

“The **fresh catalyst is pneumatically conveyed from the silo through pneumatic transfer vessels 71-74 to a surge hopper 76 or 78 with nitrogen gas from nitrogen gas injectors 80.** Smaller particles of the fresh catalyst are **removed** by vibrating screens 82 or 84. The removed smaller particles are carried by nitrogen gas through a horizontal air slide to a vertical chute and loaded into spent catalyst containers 500 on intelligence pads 38 positioned on weight scales 40 and transported to the staging area and reclamation site in a manner similar to the spent catalyst containers loaded with deoiled catalyst. Larger particles of fresh catalyst are **passed to a storage hopper 86 or 88 from which they are fluidly conveyed to the reactors of a resid hydrotreating unit (RHU) by a heavy vacuum gas oil slurry.** (column 6, lines 16-30)

The Office Action seems to misunderstand that Erickson's catalyst storage tank is just **transported or carried by a transport vehicle**, and is neither a mobile catalyst injection system, a catalyst injection system configured to be coupled to an **FCC unit**, nor a catalyst injection system adapted to control the flow of catalyst **directly** to the **FCC unit**. Furthermore, Erickson's Figure 3 also shows that Erickson's catalyst storage container is **carried and transported by a trolley/monorail** to a **fresh catalyst silos 68 or 70** and the catalyst is then transferred to the addition hopper (86 or 88) and then from the addition hopper (86 or 88) to reactor. Erickson discloses sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the silo; then from silo to addition hopper; and then from the addition hopper to reactor (i.e. from A to B to C to a reactor) as opposed to directly from a mobile catalyst injection system configured to be coupled to an FCC

Unit (i.e. from A to FCC Unit), wherein the catalyst injection system compromises a transportable platform, catalyst reservoir, and flow control device.

What is mobile or made mobile in Erickson is the truck or trailer or catalyst storage tank, not the addition system. Andon does not disclose all the claim limitations because during the sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the silo; then from silo to addition hopper; and then from the addition hopper to reactor (i.e. from A to B to C to a reactor), the addition system is not mobile, nor is the addition system configured to be coupled to an FCC unit, nor is the addition system adapted to control flow of catalyst to the FCC unit. Thus, Erickson only discloses a catalyst storage tank capable of being ‘transported or carried by a transport vehicle’ and fails to disclose a catalyst injection system that is mobile, is configured to be coupled to an FCC unit, and is adapted to control flow of catalyst to the FCC unit.

Furthermore, the Office Action fails to demonstrate any suggestion or motivation to modify Erickson’s catalyst injection system to be mobile and/or to comprise a mobile catalyst injection system configured to be coupled to an FCC unit, and/or adapted to control flow of catalyst to the FCC unit. The issue is not whether Erickson reference may merely be modified; but whether Erickson provides any suggestion or motivation to modify and a reasonable expectation of success to disclose a catalyst injection system that is mobile and configured to be coupled to an FCC and adapted to control flow of catalyst to the FCC unit. Nor has the Office Action demonstrated a reasonable expectation of success. The Office Action merely alleged “it would have been obvious” to modify Erickson without demonstrating why one of ordinary skill in the art would have allegedly been motivated to modify Erickson to disclose a catalyst injection system that is mobile and/or configured to an FCC and/or adapted to control flow of catalyst to the FCC unit. According to MPEP and past and recent case law, such mere allegations of ‘obvious to try’ is not sufficient when the situation presented is not one with “a finite number of identified, predictable solutions.” Takeda Chemical Industries, Ltd. v. Alphapharm Pty., Ltd. 06-1329. As such, Erickson fails to teach all the claimed elements and do not establish a *prima facie* case of obviousness.

Thus, Applicant respectfully submits that the rejection is overcome and independent claims 1, 18, 22, and 26 are not obvious. Applicant respectfully submits that as the current

independent claims are allowable, the claims which depend from the independent claims are also allowable.

Nonobviousness over Erickson in view of Haugen

The Office Action rejected claims 13-16, 31-32, 34 and 35 under 35 U.S.C. 103(a) as allegedly unpatentable over Erickson in view of Haugen (US 2616591).

As discussed above the Office Action *incorrectly* cites Erickson as disclosing a catalyst injection system that is mobile, configured to be coupled to an FCC unit and adapted to control the flow of catalyst directly to the FCC unit. Erickson only discloses a catalyst bin or tank that is transported or carried by a transport vehicle and disclose sequentially and spatially separate aspects of from a truck or trailer to a catalyst storage tank; then from a catalyst storage tank to the silo; then from silo to addition hopper; and then from the addition hopper to reactor (i.e. from A to B to C to a reactor) as opposed to a catalyst injection system that is mobile, configured to be coupled to an FCC Unit and adapted to control the flow of catalyst directly to the FCC unit. Haegan also fails to provide the missing suggestion or motivation to modify to provide addition system that is mobile, configured to be coupled to an FCC unit and adapted to control the flow of catalyst directly to the FCC unit.

Haugen fails to disclose a vessel configured to deliver catalyst to a fluid catalytic cracking unit (FCC unit) for multiple reasons, each of which independently refute the unsupported allegations of obviousness.

Haugen only discloses top open measuring devices traveling in a circuit or rotating over a table and repeatedly emphasizes the rotating or circuit feature and only teaches passing of measured material to an open spout, as shown below:

“In volumetric package filling machines, a hopper delivers fluent material into measuring devices traveling in a circuit over a table provided with a spout delivering to a carton or jar, or other container. With some materials and quantities, the number of packages that can be filled per minute becomes limited by the time required for the material to move through each measuring device.”
(Col 1 line 1-8)

“The object of this invention is to avoid that limit. Generally speaking, this is accomplished by making a plurality of measuring devices work together on a desired quantity of material, each contributing its separate portion simultaneously

with the other to make up the whole in correspondingly less time." (Col 1 line 1-8)

"The base 10 of the machine carries a column 11 for supporting hoppers 12 and 13, which deliver fluent material through a series of measuring devices, generally indicated by 14, rotating in a circuit over a stationary table 15 having a spout 16 adapted to deliver to a big carton, jar, or the like." (Col 1 line 36-42)

The table 15 is provided with spaced discharge openings 26 and 27 through which the measured material passes to the arms or channels 28 of the spout 16, which is forked to make these channels lead from the discharge openings to a common delivery opening. (Col 1 line 50-56)

Haugen's teaching of top open measuring devices traveling in a circuit over a table, to an open spout fails to disclose a vessel configured to deliver catalyst to a fluid catalytic cracking unit as an open spout does not and cannot deliver catalyst to an FCC unit. The open spout would just result in a spillage of the catalyst instead of delivery to the FCC unit. Furthermore, Haugen's teaching of top open measuring devices also fails to disclose a pressurizable plenum as the open top does not disclose or allow a pressurizable plenum, as recited by claims 13-16. Such self limiting structural and functional restrictions of Haugen are not just differences in degrees, but differences in kind which teach away from and or is inoperable to deliver catalyst to a fluid catalytic cracking unit.

Regarding a plurality of compartments as recited by claims 13-16, 31-32 and 34-35, Haugen not only fails to disclose but actually teaches away from a plurality of compartments by repeatedly and explicitly disclosing a revolving rotating measuring device, as disclosed above.

Consequently, Applicant respectfully submits that independent claims and the all the claims dependent thereon, are not anticipated as the Office Action fails to teach *every aspect* of the claimed invention.

As such, Erickson and Haugen references, either individually or combined, fail to teach all the claimed elements and do not establish a *prima facie* case of obviousness

Nonobviousness over Andon in view of Haugen

The Office Action rejected dependent claims 19-21, 23-25 and 33 under 35 U.S.C. 103(a) as allegedly unpatentable over Andon (US 4082513) in view of Haugen (US 2616591).

Regarding claim 19, the Office Action erroneously and mistakenly alleges Andon discloses a mobile catalyst injection system comprising: a trailer (column 2, lines 11-12) a catalyst reservoir coupled to the trailer (10) and adapted to be coupled to a fluid catalyst cracking unit (14), a pressure control system coupled to the trailer and catalyst reservoir (column 2, lines 42-61), a generator coupled to the pressure control system (inherent disclosure, see discussion *supra* at paragraph 15), and a flow control device coupled to an outlet of the reservoir (15) and adapted to control the flow of catalyst through the outlet port.

Although the Office Action even admits that Andon does not disclose a plurality of compartments and a plenum disposed in the catalyst reservoir and coupling compartments, nonetheless, the Office Action alleges that “However, Haugen discloses a dispensing device comprising a plurality of compartments (12, 13) and a plenum (17) disposed in the device and coupling the compartments.”

As discussed above, the Office Action *incorrectly* cites Andon as disclosing a catalyst injection system that is mobile, configured to be coupled to an FCC unit and adapted to control the flow of catalyst directly to the FCC unit. Andon expressly discloses a catalyst storage tank that is just capable of receiving catalyst from trucks or cars and fails to disclose a catalyst injection system that itself is mobile, configured to be coupled to an FCC unit and adapted to control the flow of catalyst directly to the FCC unit. Haegan also fails to provide the missing suggestion or motivation to modify to provide a catalyst injection system that is mobile, configured to be coupled to an FCC unit and adapted to control the flow of catalyst directly to the FCC unit.

Haugen fails to disclose a vessel configured to deliver catalyst to a fluid catalytic cracking unit for multiple reasons, each of which independently refute the unsupported allegations of obviousness.

Haugen only discloses top open measuring devices traveling in a circuit or rotating over a table and repeatedly emphasizes the rotating or circuit feature and only teaches passing of measured material to an open spout, as r referred above.

Haugen's teaching of top open measuring devices traveling in a circuit over a table to an open spout fails to disclose a vessel configured to deliver catalyst to a fluid catalytic cracking unit as an open spout does not and cannot deliver catalyst to an FCC unit. The open spout would just result in a spillage of the catalyst instead of delivery to the FCC unit. Furthermore, Haugen's teaching of top open measuring devices also fails to disclose a pressurizable plenum as the open top does not disclose or allow a pressurizable plenum, as recited in claims 19-21, 23-24 and 33. Such self limiting structural and functional restrictions of Haugen are not just differences in degrees, but differences in kind which teach away from and or is inoperable to deliver catalyst to a fluid catalytic cracking unit and provide a pressurizable plenum.

Regarding a plurality of compartments as recited in claims 19-21, 23-24 and 33, Haugen not only fails to disclose but actually teaches away from a plurality of compartments by repeatedly and explicitly disclosing a revolving rotating measuring device, as disclosed above.

As such, Andon and Haugen references, either individually or combined, fail to teach all the claimed elements and do not establish a *prima facie* case of obviousness. Consequently, Applicants respectfully submit that the independent claims are not obvious. As current independent claims are allowable, the claims which depend from the independent claims are also allowable.

NEW CLAIMS

New claims 37-38 have been added. The Applicants believe these claims to be fully supported by the specification and that no new matter has been added. The Applicants submit that the new claims are allowable for at least the reasons set forth above.

CONCLUSION

Applicant respectfully requests an Examiner interview and or submits that the present amendment places the application in condition for allowance. Thus, the Applicant submits that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issuance are earnestly solicited.

RESPONSE TO OFFICE ACTION

Serial No. 10/717,249

Page 19 of 19

If, however, the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Mr. Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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